

(Parties and counsel listed on signature page)

E-filed: November 14, 2008

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

RAMBUS INC.,

Plaintiff,

vs.

HYNIX SEMICONDUCTOR INC., et al.,

Defendants.

CASE NO.: C 05-00334 RMW

**STIPULATION AND ~~PROPOSED~~ ORDER  
RE PAGE LIMIT FOR RAMBUS'S  
CONSOLIDATED OPPOSITION TO  
MANUFACTURERS' DAMAGES-  
RELATED *DAUBERT* AND SUMMARY  
JUDGMENT MOTIONS**

RAMBUS INC.,

Plaintiff,

vs.

SAMSUNG ELECTRONICS CO., LTD.,  
et al.,

Defendants.

CASE NO.: C 05-02298 RMW

RAMBUS INC.,

Plaintiff,

vs.

MICRON TECHNOLOGY INC., et al.,

Defendants.

CASE NO.: C 06-00244 RMW

1 WHEREAS, the following *Daubert* and summary judgment motions, among  
2 others, were filed on October 24 and October 27, 2008:

3 (1) Hynix's *Daubert* Motion to Exclude Portions of Expert Report and  
4 Testimony of Rambus's Damages Expert David J. Teece (*Daubert* No. 6);

5 (2) Micron's and Samsung's *Daubert* Motion to Preclude David J. Teece From  
6 Offering Testimony Regarding an "Infringer's Royalty," Royalty Rate Surveys and Two  
7 Unquantified "Adjustments" That Allegedly "Offset One Another" (*Daubert* No. 8);

8 (3) Micron's and Samsung's Joint *Daubert* Motion and Motions in Limine  
9 Regarding Certain Damages Issues (*Daubert* No. 9);

10 (4) Nanya Technology Corporation's and Nanya Technology Corporation  
11 USA's *Daubert* Motion to Exclude Certain Testimony of Dr. Teece re: Hypothetical Negotiation  
12 Date (*Daubert* No. 10);

13 (5) Nanya Technology Corporation's and Nanya Technology Corporation  
14 USA's Motion re Royalty Base Issues (*Daubert* No. 11);

15 (6) Micron's and Samsung's Motion for Summary Judgment Regarding  
16 Certain Damages Issues and Related *Daubert* Motions to Preclude David J. Teece From Offering  
17 Testimony on Such Issues (MSJ No. 8);

18 (7) Nanya Technology Corporation's Motion for Partial Summary Judgment of  
19 Non-Infringement (Limitation of Damages/Non-U.S. Sales) (MSJ No. 9);

20 (8) Nanya Technology Corporation USA's Motion for Partial Summary  
21 Judgment of Non-Infringement (Limitation of Damages/Non-U.S. Sales) (MSJ No. 10); and

22 (9) Hynix's Motion for Summary Judgment For the Prevention of Double  
23 Recovery of Damages Relating to Hynix's Sales of DDR2, DDR3, gDDR2, and GDDR3  
24 Products (MSJ No. 11); and

25 WHEREAS, Rambus intends to file a single consolidated opposition to the above-  
26 listed motions (including any joinders to such motions);  
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NOW, THEREFORE, the parties stipulate and agree as follows:

1. Rambus's consolidated opposition brief shall be no longer than 75 pages.
2. This stipulation does not affect the Manufacturers' right to file individual reply briefs.

Dated: November 12, 2008

ROLLIN A. RANSOM (Bar No. 196126)  
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By:                     /s/                      
                    ROLLIN A. RANSOM

Attorneys for Plaintiff  
RAMBUS INC.

Dated: November 12, 2008

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By:                     /s/                      
                    SVEN RAZ

Attorneys for Defendants  
MICRON TECHNOLOGY, INC., and  
MICRON SEMICONDUCTOR  
PRODUCTS, INC.

Dated: November 12, 2008

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By:                     /s/                      
                    ROBERT S. BEREZIN

Attorneys for Defendants  
SAMSUNG ELECTRONICS CO., LTD.,  
SAMSUNG ELECTRONICS AMERICA, INC.,  
SAMSUNG SEMICONDUCTOR, INC., and  
SAMSUNG AUSTIN SEMICONDUCTOR, L.P.

1 Dated: November 12, 2008

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2  
3 By:                     /s/                    .  
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4 Attorneys for Defendants  
5 HYNIX SEMICONDUCTOR INC., HYNIX  
6 SEMICONDUCTOR AMERICA INC., and  
7 HYNIX SEMICONDUCTOR  
MANUFACTURING AMERICA INC.

8 Dated: November 12, 2008

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11 Attorneys for Defendants  
12 NANYA TECHNOLOGY  
13 CORPORATION, and NANYA  
14 TECHNOLOGY CORPORATION USA  
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**ORDER**

Pursuant to stipulation, it is so ordered.

Dated: November 13, 2008

*Ronald M. Whyte*

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The Honorable Ronald M. Whyte  
United States District Judge

1 ATTESTATION

2 **Filer's Attestation:** Pursuant to General Order No. 45, §X(B), I attest under penalty of  
3 perjury that concurrence in the filing of this e-filed document has been obtained from counsel for  
4 the Manufacturers.

5 Dated: November 12, 2008

6 By:                     /s/                    .  
ROLLIN A. RANSOM